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SUMMARY

1. PURPOSE. To provide security and policy review on the document at Tab 1 prior to release to the public.

2. BACKGROUND.

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4. VIEWS OF OTHERS. n/a

5. RECOMMENDATION. Department Head or designee reviews as subject matter expert. DFER reviews for policy and security. Coordination indicates the document is suitable for public release. Suitability is based on the document being unclassified, not jeopardizing DoD interests, and accurately portraying official policy [Reference DoDD 5230.09]. Release is the decision of the originator (author). Compliance with AFI 35-102 is mandatory.

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Tab
1. Journal Article

Fees Eat Diversification's Lunch

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Abstract

Diversifying into more-exotic asset classes comes with different price tags. We consider investment management fees relative to various asset classes' diversification benefit. We show that the fees on diversifying asset classes are astonishingly high relative to their diversification benefit. Diversification is often spoken of as the only free lunch in investing, yet we show that it is not free and is properly considered only in light of its costs. More-exotic asset classes typically come with higher investment management fees, which offset their diversification benefits. Fee levels need to be part of asset mix decisions and strategic asset allocation.

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Fees Eat Diversification's Lunch

Abstract

Diversifying into more-exotic asset classes comes with different price tags. We consider investment management fees relative to various asset classes' diversification benefit. We show that the fees on diversifying asset classes are astonishingly high relative to their diversification benefit. Diversification is often spoken of as the only free lunch in investing, yet we show that it is not free and is properly considered only in light of its costs. More-exotic asset classes typically come with higher investment management fees, which offset their diversification benefits. Fee levels need to be part of asset mix decisions and strategic asset allocation.

In an editorial in this journal, Charles Ellis (2012) reframed traditional thinking about investment management fees, saying they should be measured, not as a percent of assets under management, but rather as a percent of active management alpha. Ellis contends that, properly measured, "fees for active management are *astonishingly high*" (p. 4, our emphasis).

Earlier in this journal, Leibowitz and Bova (2005) show that exposure to the U.S. equity market is the dominant risk driver for most asset classes and most portfolios. Their "allocation betas" capture the bulk of the risk in diversified institutional portfolios. After accounting for their allocation beta, an "allocation alpha" remains. This allocation alpha reflects the true diversification benefit beyond that achievable by simply changing the portfolio beta with core assets.

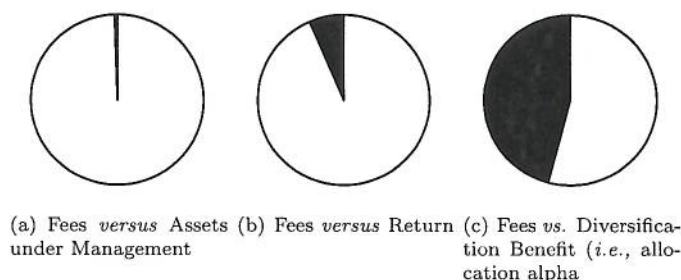
Ellis focuses on fees relative to active management alpha. Instead, we consider fees relative to different asset classes' diversification benefit, or allocation alpha. Coupling these findings from Ellis (2012) and Leibowitz and Bova (2005), we consider fees relative to diversification benefit. We contend that:

- most diversifying asset classes have risks chiefly characterized by their exposure to U.S. equity beta and much smaller truly-diversifying Leibowitz and Bova "allocation alphas,"
- most diversifying asset classes have higher investment management expenses than core asset classes, and
- these facts combine to dramatically reduce the true diversification benefits for many asset classes.

We merge the insights of Ellis (2012) and Leibowitz and Bova (2005) to show that the fees on diversifying asset classes are *astonishingly high* relative to their diversification benefit. Ellis asserts, "Investors should consider fees...as *incremental* fees versus risk-adjusted *incremental* returns above the market index" (p. 4). We contend the same for the fees associated with higher-cost diversifying asset classes—that is, investors should consider the cost of diversification against the true value-added from that diversification. We demonstrate the fee impact by focusing on fees relative to allocation alpha.

Figure 1 contrasts three perspectives on fees, using institutional-sized investments in high yield bonds as an example. Panel (a) is the traditional view, where investment management fees are considered relative to assets under management (AUM). They are clearly small. Panel (b) highlights that fees are larger as a proportion of the expected return. Panel (c) shows our point of view—that fees are “astonishingly” high relative to their diversification benefit, or allocation alpha.

Figure 1: Three Relative Views of the Same Investment Management Fee



Diversification is often spoken of as the only free lunch in investing. We show that it is not free. We begin by reviewing the Leibowitz and Bova (2005) model. We then apply this model to a third-party set of capital market assumptions and high-quality investment fee data. We demonstrate that fees re-order the relative benefits of different diversifying asset classes. We conclude by discussing the investment implications of our research.

Allocation Alpha and Beta

Leibowitz and Bova (2005) show that exposure to the U.S. equity market is the key driver of portfolio risk for most institutional portfolios.¹ They show that the widespread embrace of multi-asset diversification and the “endowment model” have not actually changed the overall risk profile of typical diversified investment pools.

Their main theme is that the U.S. equity market represents the key driver of portfolio risk. This happens because most asset classes include significant embedded exposure to the U.S. stock market. Leibowitz and Bova show this

¹The Leibowitz and Bova (2005) model is also covered in Leibowitz (2004, 2005), Leibowitz and Bova (2007), and Leibowitz, Bova, and Hammond (2010); all contend that most institutional portfolios have similar expected volatilities and similar allocation betas, and that these allocation betas give rise to allocation alphas that can enhance fund return without affecting portfolio volatility.

mathematically with their formula for allocation beta:

$$\beta_j = \rho_{j,us} \times \frac{\sigma_j}{\sigma_{us}}$$

where $\rho_{j,us}$ is the correlation of asset j with U.S. stocks, σ_j is the risk of asset j , and σ_{us} is the risk of U.S. stocks. This formula follows naturally from the capital asset pricing model.

Exhibit 1
Allocation Alpha and Beta Illustrated

Asset class		Return	Risk	Correlation with				Allocation	
				a	b	c	d	Beta	Alpha
US bonds	a	8%	8%	1.0	0.3	0.3	0.2	0.13	0.68%
US stocks	b	3%	19%		1.0	0.8	0.6	1.00	0.00%
Int'l stocks	c	8%	22%			1.0	0.6	0.93	0.48%
Hedge funds	d	5%	9%				1.0	0.28	1.65%

Notes: Assumptions are authors' own and are chosen for ease of illustration; calculations use Leibowitz and Bova (2005) allocation alpha and beta methodology with a 1.5% risk free rate.

As an example, Exhibit 1 shows international stocks have an allocation beta of 0.93 ($\beta_j = .8 \times .22 / .19 = .9263 \approx .93$) under plausible assumptions. This 0.93 beta is the proportional comovement of international stocks with U.S. equities; international stocks have exposure to 93% of the systematic risk of U.S. stocks.

After accounting for beta, asset classes have an allocation alpha:

$$\tilde{\alpha}_j = \tilde{r}_j - \beta_j (\tilde{r}_{us} - r_f) - r_f$$

where \tilde{r}_j is the return on asset j , \tilde{r}_{us} is the return on U.S. stocks, and r_f is the risk-free rate. The allocation alpha is the expected residual return after accounting for market exposures. They are *alphas* in the sense that they are independent residual returns unrelated to overall market movements. They are *allocation* alphas in the sense that they do not depend on active management but are obtainable via strategic asset allocation. These allocation alphas are also labeled passive or “structural” alpha. Unlike active management alphas, they are non-zero-sum.

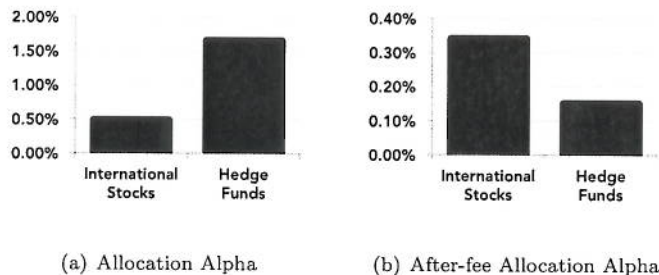
As an example, Exhibit 1 shows international stocks have an allocation alpha of 0.48% ($\tilde{\alpha}_j = .08 - 0.9263(.08 - .015) - .015$), again under plausible assumptions. This means international stocks earn approximately one-half percent more than the return explained by their comovement with U.S. stocks. So, international stocks are expected to earn 8.00% from three sources—1.50% from the risk-free rate, 6.02% from comovement with the U.S. equity market (0.9263 allocation beta exposure to the 6.50% equity risk premium), and 0.48% independent allocation alpha.

Contrast international stocks with hedge funds in Exhibit 1. Hedge funds have lower risk and return, but their allocation beta is much lower, 0.28, and hedge fund allocation alpha is much higher, 1.65%. The lower allocation beta

means hedge funds have a weaker link to the key risk factor—the U.S. equity market. The higher allocation alpha means hedge funds generate an excess return beyond that explained by the U.S. equity market.

Most such analysis stops here and highlights the greater diversification benefit of hedge funds. We want to emphasize that investing in new asset classes is costly. Based on survey data, a small institutional investor faces 0.14% in expenses for investing in international stocks passively or 0.50% if investing actively. Passive fees reduce the 0.48% allocation alpha diversification benefit almost one-third, while the active fees completely offset the diversification benefit. (Of course, the active approach might lead to a separate active management alpha.) In contrast, a small institutional investor accessing hedge funds via a fund-of-funds vehicle faces fees averaging 1-and-10, or 1.50%.² Thus, investment fees consume 91% of the structural benefit of diversifying into hedge funds. Despite the seemingly more-attractive diversification benefits of hedge funds, fees block our small institutional investor from realizing these benefits. As Figure 2 shows, the after-fee ranking of the two diversifiers switches—indeed, passive international diversification offers more than twice the after-fee allocation alpha of hedge funds. ($0.48\%-0.14\%=0.34\%$ for passive international stocks is more than twice $1.65\%-1.50\%=0.15\%$ for hedge funds.)

Figure 2: Fees Change Relative Attractiveness



By combining the insight of Ellis (2012) with the technique of Leibowitz and Bova (2005), we quantify an insight touched upon earlier in the literature. Salem (2005) asserts:

Blinded as some fiduciaries are by the theoretical virtues of diversifying their “bets” across a broad variety of “asset classes” and strategies, many trustee groups end up paying too much for “beta,” i.e., they end up sharing with managers excessive portions of the very long-term or secular gains produced by most tradable assets...(p. 5)

²Capital market return assumptions like those in Exhibit 1 for hedge funds and private equity are typically net-of-fees, but gross of fund-of-fund fees. Thus, the appropriate comparison is the 1-and-10 fund-of-fund fee *versus* the allocation alpha. The 1.50% fee is calculated as 1% plus 10% of the 5% expected return; we assume no hurdle rate.

Similarly, Kahn, Scanlan, and Siegel (2006, p. 116) stress, “You should never pay alpha fees for beta performance.”

The Leibowitz and Bova (2005) methods utilized here are related to the trend toward *portable alpha*—the separation of alpha and beta. Classic portable alpha “places strong emphasis on paying active fees only for the alpha portion of any investment and on looking closely at costs” (Kahn et al., 2006, p. 116). Likewise, we believe the Leibowitz-Bova framework places strong emphasis on paying diversification fees only upon the diversification portion of any investment; and further, it emphasizes looking closely at costs.

Expenses *versus* diversification benefits

Diversification is often spoken of as the only free lunch in investing. Here, we consider whether it is a wholesome meal or empty calories.³

Data. We have two key data sources. First, we use the J. P. Morgan (JPM, hereafter) *Long-term Capital Market Return Assumptions*. This is a publicly-available set of asset class risk, return, and correlation assumptions. It covers 45 asset classes and has been updated annually; see Shairp et al. (2012). Second, we have access to a biennial fee survey from a major institutional investment consulting firm.⁴ This data includes the average and distribution (*i.e.*, several different percentiles) of both published *and actual negotiated* investment management fees for a variety of asset classes. Together these two sources create an opportunity to evaluate real-world investment fees relative to diversification benefits.

Fee scenarios. We consider three investor-types—an average small endowment, an average state pension, and a high-quality (fee-advantaged) foundation—who vary by asset size and fee level.⁵ The investors’ dollar allocations and fee

³We acknowledge straining the food metaphor, but note Leibowitz and Bova (2007) considers whether allocation alphas are “digestible” while Leibowitz (2005) contrasts carnivorous active management with herbivore “beta grazing.”

⁴Note to reviewer: Callan, a major institutional consultant with \$1 trillion in advised client assets. We don’t have permission to disclose this broadly.


































⁵Our average small endowment has a \$100 million portfolio and gets fiftieth (50th) percentile fees. Our average state plan has a \$11 billion portfolio and also gets fiftieth (50th) percentile fees. “Average” refers to fees, not AUM. Our high-quality foundation has a \$2 billion portfolio and gets ninetieth (90th) percentile (low) fees. This is intended to reflect Malkiel’s point (2013, p. 106) that “the most sophisticated institutions do not pay the average fees.” Each investor type makes a 2% allocation to a particular active manager in the diversifying asset class, for mandate sizes of \$2 million, \$220 million, and \$40 million. The three scenarios are intended to be representative of stereotypical institutional investors. Our fees are typically not decreasing in asset size because the intermediate-sized high-quality foundation is getting particularly good fees.

In most instances, we exactly matched the fee percentile and mandate size to survey data points for *actual* (not published) investment management fees. For hedge funds and private equity, we combined the survey carry-fee data with the JPM capital market assumptions. Because the list of JPM asset classes was broader than the survey’s, we consulted with the

percentile matter enormously. For example, U.S. small capitalization equity managers charge 0.84%, 0.57%, and 0.51% of assets under management for our three investors.

Some might take exception to our use of “matter enormously,” but we stress these are enormous variations relative to allocation alphas we observe in the JPM data. This range of fees is one-third of the allocation benefit of small capitalization stocks (the 0.84%–0.51% range of fees is over one-third of the calculated 0.85% allocation alpha); the thirty-three basis point range of fees might be enough to change decisions about the attractiveness of small capitalization stocks.

Exhibit 2 How Big a Slice of the Pie? Fees Relative to Allocation Alpha

Asset class	Allocation Alpha	Small Endowment Fees	State Pension Fees	Quality Foundation Fees
US TIPS	0.52%	0.27% 	0.30% 	0.20% 
US high yield	1.09%	0.50% 	0.49% 	0.46% 
EM gov't bonds	0.36%	0.60% 	0.60% 	0.53% 
US small cap	0.85%	0.84% 	0.57% 	0.51% 
EM equity	2.91%	0.95% 	0.55% 	0.58% 
Private equity	0.68%	1.00% 	1.16% 	0.72% 
Real estate	2.65%	0.76% 	0.68% 	0.48% 
REITs	0.97%	0.75% 	0.69% 	0.66% 
Diversified HF	1.63%	1.63% 	1.51% 	0.97% 
Event-driven HF	1.02%	1.67% 	1.55% 	0.99% 
Macro HF	3.16%	1.70% 	1.58% 	1.00% 

Notes: J. P. Morgan capital market assumptions, Leibowitz and Bova (2005) allocation alpha methodology, fee data (total fee) based on an institutional investment consultant's survey. Black section in pie charts shows proportion of allocation alpha lost to *incremental* fees, which depend crucially on the fees of the funding assets.

Fees eat allocation alpha. In Exhibit 2, we evaluate a subset of diversifying asset classes from the JPM *Long-term Capital Market Return Assumptions*. The 11 chosen are typical diversifiers considered by institutional investors and private wealth managers.

Fees declined as expected, with the large state pension generally getting better pricing than the small endowment and with the high-quality foundation generally besting both of the others. Contrary to expectations (see footnote 5),

survey provider on the appropriate mapping for the missing asset classes and/or supplemented the primary data with fee data from two additional fee surveys from other providers.

however, the fee advantage of the foundation was not particularly focused on the highest allocation alpha asset classes.

In Exhibit 2, we ask “how big a slice of the pie” do fees consume? For this, we focus on incremental fees since the allocation alpha is an incremental return.⁶ The shocking answer is that the incremental fees consume half the alpha in nearly 40 percent of the cases. Even our fortunate foundation investor, with top-quality fee negotiating ability and reasonable scale, finds that 5 of 11 diversifying asset classes have the majority of diversification benefits disappearing to fees.⁷

Choosing half the allocation alpha as the breakpoint for unreasonableness is arbitrary. The assets belong to the investor, not the money manager. Why would the money manager be entitled to even one-third or one-quarter of the allocation alpha? The risk is borne by the investor, not the money manager. Whatever one’s views on the investor-manager split of an active management alpha,⁸ allocation alpha is different; we should not expect managers to be able to retain any positive portion of it in a competitive market, as it is not “earned” by active managers. Costly access to diversifying asset classes is an economic inefficiency, albeit a seemingly persistent one.

Interestingly, using incremental fees results in the odd situation of the high-quality foundation, with particularly good fee levels, losing more of the allocation alpha to fees. This is because getting ninetieth percentile (good) fees is more valuable in (commodity-priced) core bonds and large capitalization U.S. stocks than in most diversifying asset classes; thus the *incremental* cost for the quality foundation is sometimes higher than for the state pension and small endowment getting median fees. This is not the result we anticipated when we envisioned the three fee scenarios.

The bottom line is that fees consume a high proportion of diversification benefit from most asset classes. The pie charts in Exhibit 2 show a lot of black—the portion “eaten” by fees. Considering fees should slow the rush to diversify.

⁶To calculate incremental fees for diversifying assets, we assumed the money was sourced from core bonds, large capitalization U.S. stocks, or some combination thereof. Bonds funded diversifying bonds, and stocks funded diversifying stocks; for less-obvious diversifying assets, we used Leibowitz and Bova (2005) allocation betas to determine the proportion funded from stocks. The incremental fee is thus the difference between the fee on the diversifying asset and the fee on the source of funds. (For example, the small endowment faces fees of 0.50 percent on high-yield bonds, which is higher than their 0.24 percent fees on core bonds. This incremental 0.26 percent fee consumes 24 percent of the 1.09 percent structural, or allocation, alpha.) Results were qualitatively robust to using beta for all assets and to the Jennings (2009) approach, which relies on mean-variance optimization to specify funding sources.

⁷If a lower threshold of one-quarter of the allocation alpha is used, the results are more dramatic. Over seventy percent of the asset classes are no longer viable diversifiers. Fees offset the diversification benefit for seven or eight of the eleven asset classes for the high-quality foundation and the state pension; only the mildly-prosaic diversifiers of emerging market equity and direct real estate have a meaningful after-fee allocation alpha for all three institutional investors.

⁸See Berk (2005) on why investment managers should be able to keep all active-management alpha. Contrast this with Malkiel (2013, p. 108): “It is hard to think of any other service that is priced at such a high proportion of value,” suggesting asset owners should keep more alpha.

Funds of hedge funds. In Exhibit 2, we assume the investors are using funds of hedge funds. With the fiftieth percentile fund-of-fund fees we assume for the small endowment and state pension, almost all benefit from diversified hedge funds disappears. Only the high-quality foundation (with very low fees) keeps anything material, but even then it is giving up a significant proportion of the allocation alpha. (Exhibit 2 includes event driven hedge funds and global macro hedge funds to show that quantities lost to fees vary by hedge fund type; nonetheless, the incremental fees for all types of hedge fund of funds are high.) The benefits of fund of funds—delegation, manager diversification, due diligence, and access—may come at *such a cost* as to obviate the benefits of the underlying hedge funds.

One obvious conclusion is to invest directly and avoid fund-of-fund fees. Recent research contends “the break-even point above which direct investment is cost effective is around a \$200 million hedge fund allocation” (Agarwal et al., 2013, p. 6). Investing directly in either private equity or hedge funds is not always possible, in which case investors must negotiate well or walk away.

Re-ranking desirability. Exhibit 2 focuses on a handful (11) of diversifying asset classes. When we consider the full 45 asset classes in the JPM *Long-term Capital Market Return Assumptions*, we obtain similar results. Figure 3 shows the 45 asset classes, sorted in descending order of allocation alpha; the most attractive diversifiers are on the left, and nine unattractive (negative allocation alpha) diversifiers are on the right. The figure also shows that a number of positive allocation alpha asset classes become unattractive after considering incremental fees.⁹

Also note that the fees vary widely and randomly as one evaluates asset classes left to right. The pre-fee and post-fee sorted asset classes are very different. If fees did not matter, the after-fee plot would just be a smooth and shifted-lower version of the pre-fee plot. Instead, we see a jagged and variable line. Fee-agnostic consideration of asset classes is unwise.

⁹For a list of these 45 asset classes and the pre- and post-fee allocation alphas, please see the authors’ website.

Figure 3: Some Attractive Asset Classes Are More Affected by Investment Management Fees than Others

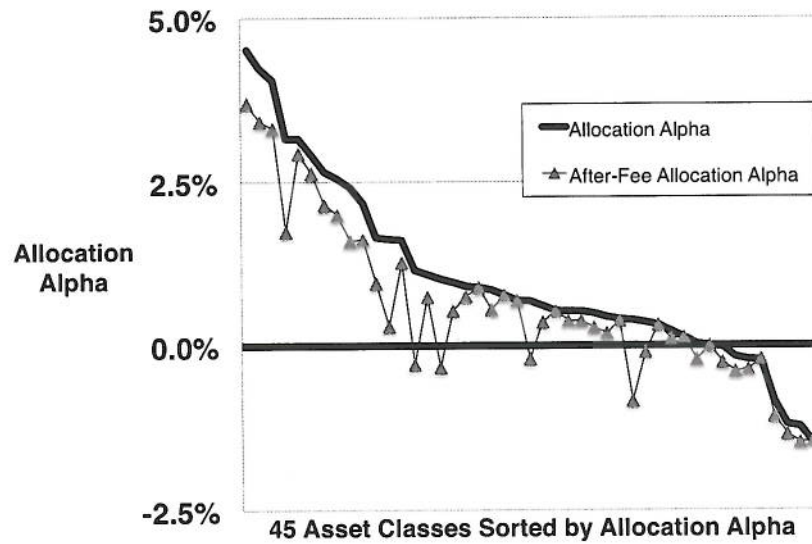
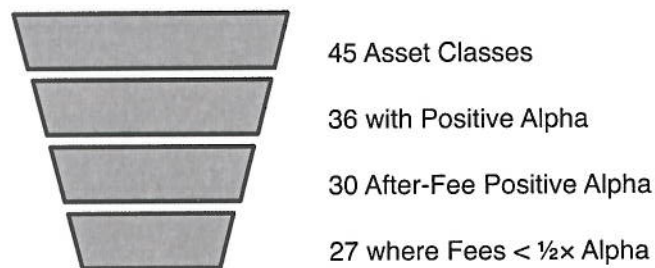


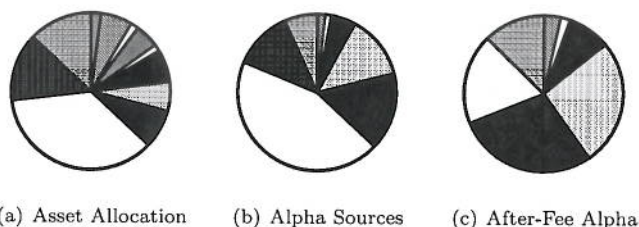
Figure 4: Considering Fees Filters the Number of Acceptable Asset Classes



Diversification benefits become negative, tiny, or disproportionately absorbed by fees. Figure 4 shows that the 45 asset classes in the JPM *Long-term Capital Market Return Assumptions* are filtered down to 27 acceptable asset classes if an investor requires both a positive after-fee allocation alpha and a reasonable sharing of the pre-fee allocation alpha. Fully forty percent of the asset classes are eliminated from consideration as diversifiers—half of these due strictly to investment management fees.

Portfolio example. Figure 5 shows three views of the same asset mix. The asset allocation in Panel (a) comes from an outsourced CIO provider of “endowment model” investment solutions.¹⁰ As such, it includes heavy use of alternative assets; core stock and bond allocations are only 21 percent of the portfolio. When we look at the asset-weighted alpha sources in Panel (b), we see it does not correspond to the asset mix in Panel (a), with some asset classes disappearing because of no alpha contribution (*e.g.*, U.S. equities) and others changing size. (The coloration assigned each asset class corresponds from panel to panel. We do not identify the asset classes because our point is more general—it is about the changing mix rather than the exact composition.) However, when we incorporate our fee data in Panel (c), the mix changes even more significantly. Again, some asset classes disappear and others change size. These three graphs show that the relative importance of different diversifiers changes when investors account for fees.

Figure 5: Three Views of the Same Asset Mix



The coloration assigned each asset class does not change from panel to panel. We do not identify the asset classes because our point is about the changing mix rather than the exact composition.

Fees and the risk of diversification. The promise of diversification carries risk. Rational investors demand compensation for this risk. Investment management fees can affect this upside-*vs.*-fee analysis, as Ennis (2005) and Sharpe (2013) show. In the case of allocation alpha (our measure of diversification benefits), the risk can be large. Leibowitz and Bova (2005, eqn. A8) quantify this

¹⁰Note to reviewer: Makena, founded by ex-Stanford CIO Michael McCaffery.

specific risk as:

$$\sigma_j \sqrt{1 - \rho_{us,j}^2}$$

The riskiness of a particular asset class’s allocation alpha is typically ameliorated by higher correlation with U.S. stocks.

For example, consider diversified hedge funds, which Exhibit 2 shows to have a 1.63% allocation alpha (one of the largest diversification benefits). Per Leibowitz and Bova (2005, eqn. A8), this alpha has a risk, or tracking error, of 6.5%. Here, the information ratio is 0.25, one of the most attractive reward-to-risk ratios in the the JPM *Long-term Capital Market Return Assumptions*.

These alpha and risk values mean that hedge funds have a 60 percent chance of delivering diversification benefits in a given year. When we consider fees, however, this probability drops to 52 percent—a margin sufficiently close to a coin toss to make investors think twice about the proposed investment. The point is that investment management fees are a *certain deadweight loss* while the riskiness of the diversification benefit remains, even when the allocation alpha is large.

Caveats. Because we used a third-party set of capital market assumptions, we hope to avoid the perception that we have set up a straw man to support our thesis. We benefited from having a single, consistent perspective on asset class prospects and risks, rather than gathering asset class assumptions from a number of sources. However, specific conclusions from Exhibit 2 are dependent on those capital market assumptions. Clearly, this analysis is model-dependent; however, we believe other capital market assumptions will support the thrust of our conclusions—that fees frequently offset diversification benefits and re-order the relative attractiveness of diversifying asset classes.

Our fee data focuses on active management. Clearly, indexing is cheaper. Index fund fees clearly consume less allocation alpha. But note that the “share of the pie” in Exhibit 2 focuses on incremental fees where an actively-managed investment is funded from an actively-managed source. Ellis (2012) has already made the point about active management consuming a large share of the (hoped-for) alpha pie; our point is different in that it is separate from active management. Note further that specialized passive investments are also more expensive than core passive investments. *There are still incremental costs of diversification with indexed alternative investments.* Incremental costs of diversification offset the incremental benefits. Further, many alternative asset classes preclude indexing. Finally, several of the diversifying asset classes evaluated are exactly the purportedly inefficient asset classes where active management potentially makes more sense.

Without loss of generality, we focus on external *investment management* fees, where we have high-quality survey data. Callan (2013) notes, “External investment management fees represent the lion’s share of total fund expenses at 90%.” The other parts of investment cost—staff oversight time, due diligence

expenses, transaction costs, and “governance overhead”—are also likely higher for diversifying asset classes.

We use our fee data in a way that presumes a small mandate with a particular manager in the diversifying asset class. For a small investor, a reasonable response to fees “eating” alpha is to consolidate funds and have larger accounts with fewer managers, thereby lowering fees. As Ellis (2010, p. 203) notes: “Endowment funds under \$5 billion should especially consider rejecting the strategy of deploying assets in specialist assignments to numerous active managers.”

Conclusion and investment implications

There’s no such thing as a
free lunch.

popularized by
Milton Friedman

Diversification is the foundational principle of modern portfolio construction. We show the so-called “free lunch” of diversification is anything but free. Diversification is properly considered only in light of its costs. More-exotic asset classes typically come with higher investment management fees. Higher fees offset diversification benefits. In many cases, the extra fees completely overwhelm the diversification benefit—fees obviate all benefit of many seemingly-attractive diversifiers.

While inferences about asset classes depend crucially on the period- and provider-specific capital market assumptions used, our after-fee analysis suggests skeptical, fee-aware scrutiny of the following asset classes:

- hedge funds
- private equity
- narrow mandates in public equity
- global bonds

In contrast, our analysis (which relies on particular third-party capital market assumptions) finds certain real assets and emerging market investments remain attractive even after accounting for their higher fees.

Many investment consultants like to separate asset allocation decisions from manager selection and investment vehicle discussions. Our analysis demonstrates that doing so is unwise. Fees are central to investment vehicle and manager evaluation. To paraphrase Ennis (2005, writing about active management), a good diversifying asset class “cannot be good irrespective of cost.” Too often, fees change the relative attractiveness of diversifying asset classes. *Fee levels need to be part of asset mix decisions and strategic asset allocation.*

Other key implications for investors include:

- Avoid fund-of-fund expenses. If that is not an option, negotiate well or walk away.
- For smaller investors, consider consolidating assets at fewer managers in order to receive fee discounts.
- Likewise, consider “diversified diversifiers” to package several diversifying asset classes into larger, fee-advantaged accounts (*e.g.*, multi-asset real return funds).
- If passive exposure to the diversifying asset class exists, consider indexing. The fee differential (along with the fee level) is often smaller with indexed alternatives.
- Even investors with exceptional fee arrangements (like our high-quality nonprofit) need to be mindful of our results. Advantageous fees can still consume the bulk of the diversification benefit.

More broadly, consider the “conventional investing in a complex world” approach advanced by Maynard (2013).

Ellis (2010, p. 22) notes that changing a 60/40 stock/bond mix to a 70/30 one “may not be a major proposition” and would likely increase return more than seeking after active management alpha. We think this is a relevant insight in this paper’s context. To borrow Ellis’ wording, increasing the equity allocation “can result in an improvement in total return significantly greater than the elusive increment sought in the widespread” rush to diversify. That is, the Leibowitz and Bova (2005) allocation beta may be more important in determining portfolio returns than the diversification allocation alpha—particularly after accounting for fees. *Investors might be wiser to increase their equity allocation than to seek additional returns from diversification to expensive alternative assets.*

Fees matter. Malkiel (2013, p. 107) claims, “Investors should consider fees charged...not as a percentage of total returns, but as a percentage of the risk-adjusted incremental returns above the market;” likewise, Ellis (2012) contends that, properly measured, fees “are astonishingly high.” Munger (2000) goes so far as to coin a word “febezzlement,” or the functional equivalent of embezzlement, to describe “unnecessary nonproductive investment costs.” Sharpe (2013) demonstrates that seemingly small differences in fees compound to dramatic effect. We add to the discussion of the vital, but too-often ignored, topic of fees.

We have demonstrated that costs matter in the so-called “free lunch” of diversification. By comparing the incremental benefit of diversification with the incremental cost, we show many seemingly attractive investments become unacceptable as diversifiers. We also show that fees re-arrange the relative attractiveness of many diversifying asset classes. While it might seem obvious that diversifying asset classes have higher investment management fees, we think that readers will be surprised by the magnitude of the problem—of how much of the diversification benefit is absorbed by higher fees.

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